

1 **LEWIS BRISBOIS BISGAARD & SMITH LLP**

REUBEN B. JACOBSON, SB# 167972

2 Email: Reuben.Jacobson@lewisbrisbois.com

CAROL SLEETH, SB# 111460

3 Email: Carol.Sleeth@lewisbrisbois.com

SANDRA K. INDECH, SB# 206417

4 Email: Sandra.Indech@lewisbrisbois.com

333 Bush Street, Suite 1100

5 San Francisco, California 94104-2872

Telephone: 415.362.2580

6 Facsimile: 415.434.0882

7 Attorneys for Defendant UKIAH ADVENTIST HOSPITAL

aka UKIAH VALLEY MEDICAL CENTER

8
9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO

11
12 DR. ALAN SAMPSON M.D. & KATHY
13 SAMPSON on behalf of the ESTATE OF
ANDREW SAMPSON,

14 Plaintiffs,

15 vs.

16 UKIAH VALLEY MEDICAL CENTER;
17 ADVENTIST HEALTH; DEBBIE L. MARKS,
MD; CALSTAR; & the DEPARTMENT OF
18 CALIFORNIA HIGHWAY PATROL; and
DOES 1 through 10,

19 Defendants.

CASE NO. 3:15-CV-00160-WHO

**STIPULATION AND ORDER
TO CONTINUE THE TIME TO FILE A
MOTION FOR SUMMARY JUDGMENT
AND FOR HEARING ON THE MOTION
FOR SUMMARY JUDGMENT**

20
21 **IT IS HEREBY STIPULATED** between Plaintiffs DR. ALAN SAMPSON M.D. & KATHY
22 SAMPSON, on behalf of the ESTATE OF ANDREW SAMPSON (“Plaintiffs”) and Defendant
23 UKIAH ADVENTIST HOSPITAL aka UKIAH VALLEY MEDICAL CENTER (“Defendant”), by and
24 through their respective attorneys of record as follows:

25 Good cause appearing therefore in order to complete Mediation prior to the necessity of filing the
26 anticipated Motion for Summary Judgment by Ukiah Adventist Hospital aka Ukiah Valley Medical Center and
27 opposition by Plaintiffs, the Parties stipulate and request the Court order that the cut off for hearing dispositive
28 motions be continued from June 7, 2017 to June 28, 2017, with the filing of such motion to be commensurate with

4819-8422-1767.1

3:15-CV-00160-WHO

STIPULATION AND ORDER TO CONTINUE THE TIME TO FILE A MOTION FOR SUMMARY
JUDGMENT AND FOR HEARING ON THE MOTION FOR SUMMARY JUDGMENT

1 the continued hearing cut-off date of June 28, 2017 for UKIAH ADVENTIST HOSPITAL aka UKIAH
2 VALLEY MEDICAL CENTER's anticipated Motion for Summary Judgment.

3 IT IS SO STIPULATED.
4

5 DATED: April 28, 2017

LEWIS BRISBOIS BISGAARD & SMITH LLP

7 By: /s/ Reuben B. Jacobson

8 Reuben B. Jacobson

9 Carol Sleeth

10 Sandra K. Indech

11 Attorneys for Defendant UKIAH ADVENTIST HOSPITAL
12 aka UKIAH VALLEY MEDICAL CENTER

13 DATED: April 26, 2017

MILLSTEIN & ASSOCIATES

14 By: /s/ Gerald S. Richelson

15 David J. Millstein, Esq.

16 Gerald S. Richelson, Esq.

17 Attorneys for Plaintiffs

18 DR. ALAN SAMPSON M.D. &

19 KATHY SAMPSON on behalf of the
20 ESTATE OF ANDREW SAMPSON
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROPOSED ORDER

GOOD CAUSE APPEARING THEREFORE, based on the request and stipulation of the parties and in order to complete mediation prior to the necessity of filing and opposing the anticipated Motion for Summary Judgment by UKIAN ADVENTIST HOSPITAL aka UKIAH VALLEY MEDICAL CENTER, the Court orders that the cut-off for hearing dispositive motions be continued from June 7, 2017 to June 28, 2017 with the filing of such motion to be commensurate with the continued hearing cut-off date of June 28, 2017 for UKIAH ADVENTIST HOSPITAL aka UKIAH VALLEY MEDICAL CENTER's anticipated Motion for Summary Judgment.

DATED: May 12, 2017



The Honorable
Judge of the United States District Court